

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In re:

Stream TV Networks, Inc.,¹

Debtor.

Chapter 11

Bky. No. 23-10763 (MDC)

In re:

Technovative Media, Inc.,

Debtor.

Chapter 11

Bky. No. 23-10764 (MDC)

(Joint Administration Requested)

**NOTICE OF DEBTORS' AMENDED EMERGENCY MOTION FOR ENTRY OF AN
ORDER: (1) ENFORCING THE AUTOMATIC STAY; (2) DIRECTING THE
TURNOVER OF PROPERTY OF DEBTORS' ESTATE; AND (3) IMPOSING
SANCTIONS FOR WILLFUL STAY VIOLATIONS**

The Debtors in the above-captioned matters have filed their Amended Emergency Motion for Entry of an Order: (1) Enforcing the Automatic Stay; (2) Directing the Turnover of Property of Debtors' Estate; and (3) Imposing Sanctions for Willful Stay Violations requesting that the court enforce the stay, direct the turnover of property, and for sanctions.

1. **Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in these Chapter 11 Cases. (If you do not have an attorney, you may wish to consult an attorney) (the "Motions").**
2. An Expedited Hearing is scheduled to be held on April 14, 2023 at 10:30 a.m. in Courtroom #2, United States Bankruptcy Court, 900 Market Street, Philadelphia, PA 19107 before the Honorable Magdeline D. Coleman. Unless the court orders otherwise, the hearing on this contested matter will be an **evidentiary hearing**.
3. At the Expedited Hearing, the court will consider the Debtors' motions and applications that are listed below:

¹ The Debtors, along with the last four digits of the Debtors' federal tax identification numbers, are Stream TV Networks, Inc. (4092) and Technovative Media, Inc. (5015). Their corporate headquarters is located at 2009 Chestnut Street, 3rd Floor, Philadelphia, PA 19103. The location of the Debtors' service address is: 2009 Chestnut Street, 3rd Floor, Philadelphia, PA 19103.

- Emergency Motion for Entry of an Order Enforcing the Automatic Stay and for Sanctions for Willful Stay Violation; and
 - Amended Emergency Motion for Entry of an Order Enforcing the Automatic Stay and For Sanctions for Willful Stay Violation and the Amended Emergency Motion for Entry of an Order: (1) Enforcing the Automatic Stay; (2) Directing the Turnover of Property of Debtors' Estate; and (3) Imposing Sanctions for Willful Stay Violations
4. **If you do not want the Court to grant the relief sought in the Motions** or if you want the court to consider your views on the Motions, then you must either file a response by April 12, 2023 (*see Instructions on the next page*) or appear at the hearing.
 5. Copies of motions and applications that will be heard at the Expedited Hearing are enclosed [or will be delivered separately].
 6. **If you do not file a response (*see Instructions on next page*) or appear at the hearing, the court may grant the relief that has been requested.**

Filing Instructions

- A. **If you are required to file documents electronically by Local Bankruptcy Rule 5005-1**, you must file your response electronically.
- B. **If you are not required to file electronically**, you must file your response at
- United States Bankruptcy Court
Eastern District of Pennsylvania
Robert N.C. Nix, Sr. Federal Courthouse
900 Market Street, Suite 400
Philadelphia, PA 19107
- C. If you mail your response to the bankruptcy clerk's office for filing, you must mail it early enough so that it will be received by April 12, 2023 .
- D. On the same day that you file or mail your Response to the Motion, you must mail or deliver a copy of the Response to the movant's attorney.

Rafael X. Zahralddin-Aravena (PA Bar No. 71510)
LEWIS BRISBOIS BISGAARD & SMITH, LLP
550 E. Swedesford Road, Suite 270
Wayne, PA 19087
Telephone: (302) 985-6000
Facsimile: (302) 985-6001
Rafael.Zahralddin@lewisbrisbois.com

Date: April 7, 2023

Respectfully submitted,

/s/ Rafael X. Zahralddin-Aravena
Rafael X. Zahralddin-Aravena (PA Bar No. 71510)
LEWIS BRISBOIS BISGAARD & SMITH, LLP
550 E. Swedesford Road, Suite 270
Wayne, PA 19087
Telephone: (302) 985-6000
Facsimile: (302) 985-6001
Rafael.Zahralddin@lewisbrisbois.com

-and-

Vincent F. Alexander (admitted *pro hac vice*)
LEWIS BRISBOIS BISGAARD & SMITH, LLP
110 SE 6th Street, Suite 2600
Fort Lauderdale, FL 33301
Telephone: (954) 728-1280
Facsimile: (954) 678-4090

Vincent.Alexander@lewisbrisbois.com

-and-

Bennett G. Fisher (pro hac pending)
LEWIS BRISBOIS BISGAARD & SMITH, LLP
24 Greenway Plaza, Suite 1400
Houston, TX 77046
Telephone: (346) 241-4095
Bennett.Fisher@lewisbrisbois.com
Proposed Counsel to Debtors

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on April 7, 2023, I electronically filed the foregoing document with the Clerk of Court using CM/ECF. I also certify that the foregoing document is being served this day by transmission of Notice of Electronic Filing generated by CM/ECF on all parties who are authorized to receive electronically Notice of Electronic Filing in this bankruptcy case.

/s/ Rafael X. Zahralddin-Aravena
Rafael X. Zahralddin-Aravena